

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF PUERTO RICO

UNITED STATES OF AMERICA,
Plaintiff,

vs.

LUCRECIO ELENA-PAREDES
Defendant.

Criminal No. 25-188 (GMM)

SENTENCING MEMORANDUM

Lucrecio Elena-Paredes files this sentencing memorandum and respectfully requests this Court to impose a sentence of time served. The circumstances surrounding his case, make the time he has already served¹ sufficient but not greater than necessary to accomplish the purposes of the §3553 factors.

Mr. Elena was born and raised in Miches, Dominican Republic. He was raised in a small house made of wood and zinc planks. The house where he grew up had two bedrooms, one for his parents and the other one Lucrecio and his ten siblings. The house had a dirt floor and no running water. Mr. Elena and his family had to get water from a nearby river. Life was tough growing up. His family was very, very poor; they were agricultures and grew enough root vegetables to get by, as to meat he remembers seldomly having any as a kid.

He went to school in the morning and in the afternoon, Lucrecio and his siblings had to help around the house. He describes his family as close nit. Even

¹ Mr. Elena-Paredes was arrested on April 6, 2025. By June 10, 2025, Mr. Elena Paredes would have served two (2) months and four (4) days.

though, they did not have much, he received a lot of love and good values from his parents.

At age 15, Lucrecio and his aunt received a work visa to work farming in Puerto Rico. He moved here with her and worked cleaning the cattle area at a dairy farm. Five years later he moved to New York, and being young and stupid he started to hang out with the wrong kind of friends. That's how he was arrested in the case that got him deported.

Lucrecio has three children, Xavier, who is 32 years old, Steven, who is 23, and the light of his eyes Brittany who just turned 11 years old. Xavier and Steven are both U.S. Citizens and live in the mainland. Brittany lives with her mother in the Dominican Republic.

He was working as a painter in Puerto Rico, painting buildings and schools. He made enough money to get by and help his mother, Domitila Paredes, who is 93 years old and ill and for Brittany. Domitila has arthritis, poor blood circulation and memory problems.

After the massive deportations started, Lucrecio knew that returning to the Dominican Republic was the right thing to do. He knew his mother needed assistances and he coordinated to have his belongings sent to the Dominican Republic. He was arrested at the airport trying to go back to his native country, to his family and his adored daughter. The suitcase that was left behind had some brushes and things that he wanted to take back with him to start a painting business

to provide for his family over there. This demonstrates that Lucrecio had plans to establish himself in the Dominican Republic and stay there.

Lucrecio accepts full responsibility for coming to Puerto Rico illegally and the consequences of his actions. His incarceration has been difficult. He worries constantly about his inability to provide the money he knows his family needs. He understands now that coming back illegally is not an option. Lucrecio have no history of violence or substance abuse.

Additionally, we ask that the Court considers that he may spend additional time incarcerated while waiting on deportation proceedings.

FOR THESE REASONS, the history and characteristics of the defendant, the nature and circumstances of the offense, considering the factors set forth at 18 U.S.C. § 3553(a), the need to provide just punishment, and the prospects of rehabilitation, this Honorable Court should conclude that a sentence of time served is enough, and not greater than necessary to accomplish the goals of punishment, deterrence and public safety.

WHEREFORE, it is respectfully requested that this Honorable Court take notice of the foretasted, and sentence Mr. Elena to the time he has already served.

I HEREBY CERTIFY that on this date I electronically filed this notice with the Clerk of Court using the CM/ECF system which will send notification this filing to the parties of record.

RESPECTFULLY SUBMITTED.

In San Juan, Puerto Rico, this 5th day of June 2025.

RACHEL BRILL
Federal Public Defender
District of Puerto Rico

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